



August 23, 2013

Carl Erickson
Contracting Officer
Okanogan-Wenatchee National Forest
215 Melody Lane
Wenatchee, WA 98801

Re: RFP AG-05G1-S-13-9001, Mill Creek A to Z Stewardship Project

Dear Mr. Erickson,

The following comments are in response to your questions and request for clarification. Several of the items were discussed at our meeting and resolved at that time. [REDACTED]

Pricing Questions:

Line 1- [REDACTED]
[REDACTED]

Line 2- [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

VAAGEN BROS. LUMBER, INC.

COLVILLE OPERATION
565 WEST 5TH COLVILLE, WA 99114
PHONE (509) 684-5071 FAX (509) 684-2168

USK OPERATION
POST OFFICE BOX 309 USK, WA 99180
PHONE (509) 445-1732 FAX (509) 445-1072

Line 3, 4, 5 – [REDACTED]

Line 6– [REDACTED]

Line 11 – [REDACTED]

Concerns

Appearance of Conflict of Interest:

In our meeting, it was proposed that there be a mechanism where the Forest Service can interact directly with our NEPA contractor (CFS). It is our intention that this is how communication will occur. CFS may address this further, but we never intended to put Vaagen Bros. in a position as a go-between.

Vaagen Bros. has been involved in the Northeast Washington Forestry Coalition (NEWFC) since its inception. We have participated to some degree in every project the coalition has collaborated on. We don't necessarily always participate in collaboration at the "project" level. NEWFC's decisions are by consensus and no single company or interest group can single-handedly steer the collaboration. With this said, it is our plan to continue to be involved in NEWFC if we are awarded the Mill Creek A to Z Stewardship Project. Vaagen Bros. is willing to abstain from "voting" on any issues pertaining to this project if a situation arises where voting becomes necessary.

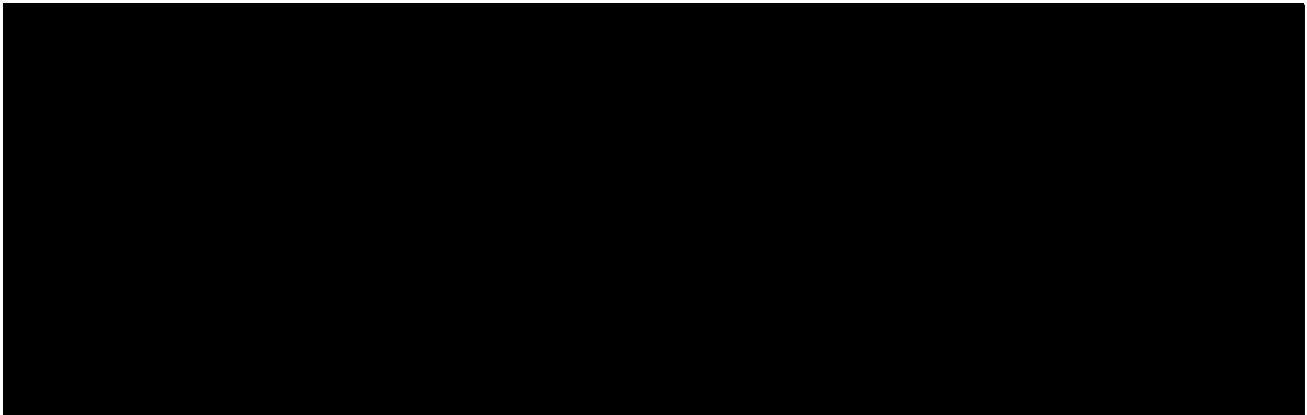
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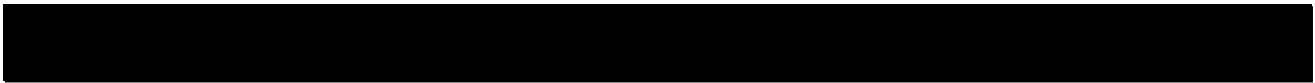
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Key Personnel:



Engineering Services:



Sincerely,

A handwritten signature in cursive script, appearing to read 'Josh Anderson'.

Josh Anderson
Timber Manager

VAAGEN BROS. LUMBER, INC.

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AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER


DISCLOSURE STATEMENT

for CFS concerning the performance of the NEPA process
paid for by VBL and for the USFS

I, MARIL TEPLEY, of CFS have made inquiry and to the best of my knowledge and belief declare that executing the NEPA process which is contracted through VBL does not represent an actual or potential conflict of interest and CFS does not have any financial or other interest in the outcome of this project.

I understand the term "conflict of interest" to mean that because of other activities or relationships with other persons, the contractor is unable or potentially unable to render impartial assistance or advice to the Government, or the contractor's objectivity in performing the contract work is or might be otherwise impaired, or the contractor may have an unfair competitive advantage. I understand the phrase "no financial or other special interest in the outcome of the project" to include any financial benefits such as a promise of future construction or design work on the project, as well as indirect benefits the consultant is aware of other than the enhancement of the contractor's professional reputation.

Signed:


[name]

Employers name:

COLUMBIA RIVER SCIENCE

Phone number:

360-456-4621

To : Josh Anderson and Mark Teply,

As you are aware, the Council of Environmental Quality's (CEQ) Implementing Regulations for the National Environmental Policy Act (NEPA) require that third parties preparing an environmental Impact Statement (EIS) for a federal agency "shall execute a disclosure statement prepared by the lead agency... specifying that they no financial or other special interest in the outcome of the project" (40 *Code of Federal Regulation* 1505.5 (c)). Given the unique nature of the Mill Creek Stewardship contract, it is essential that we ensure that this disclosure apply to the entire NEPA process and not just to EIS's. This is called for in C.2 of the contract.

In an effort to meet this requirement, we are requesting the company official responsible for Cramer Fish Science's (CFS) performance of the NEPA portion of the contract, paid for by Vaagen's Bros. Lumber, Inc (VBL) sign the following disclosure statement. The disclosure statement is essential to ensure that the U.S. Forest Service (USFS) is able to accept end result documents for processing the NEPA portion of this Stewardship contract.

In addition, if CFS or VBL have been involved in developing any initial data or plans for the A to Z project, please, on a separate sheet state the scope and extent of this prior involvement.

If you have questions regarding this letter, the disclosure statement, please contact me at 509.664.9316.

Sincerely,

Carl Ericksen
Contracting Officer

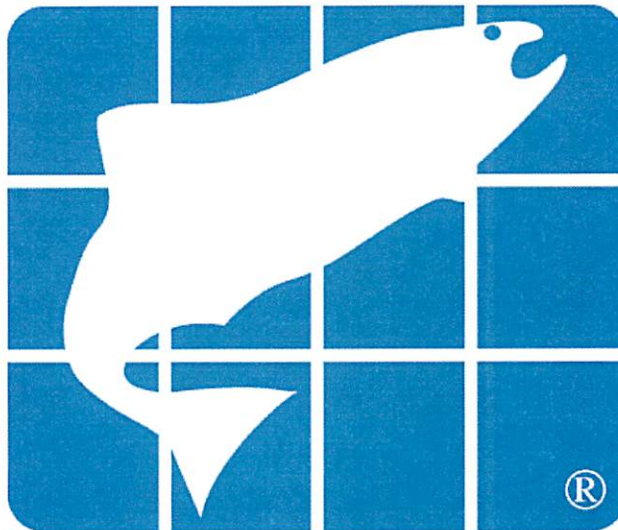
Attachments

Cramer Fish Sciences

Mill Creek A to Z Stewardship on the Colville National Forest

Technical Proposal-NEPA

July 1, 2013



Lead Organization Name and Address:

Cramer Fish Sciences
4405 7th Avenue SE, Suite 306
Lacey, WA 98503
360.456.4621 V
360.456.4621 F
www.fishsciences.net

Organization Contact and Project Manager:

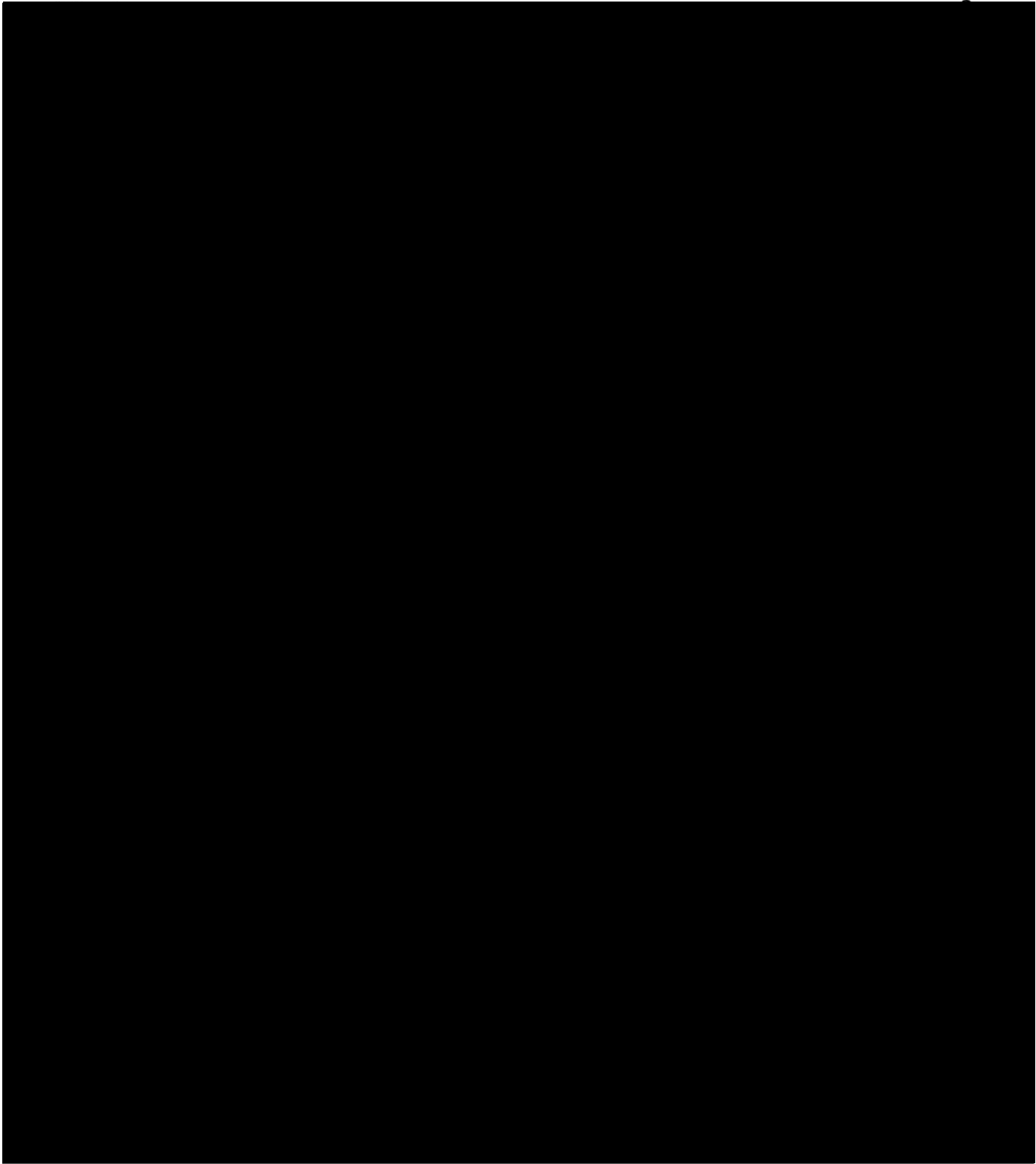
Mark Teply
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mark.teply@fishsciences.net

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Introduction

Cramer Fish Sciences (CFS) is pleased to submit this proposal to provide professional services to prepare an environmental analysis in accordance with NEPA addressing vegetation and access management on the Three Rivers Ranger District. We have assembled a highly qualified team with extensive forest planning experience in the Pacific Northwest. Our team has led and participated in many collaborative processes to develop natural resource management solutions that balance social, economic, and ecological interests. Over the past two decades, our team has led and participated in many defensible NEPA analyses addressing forest management activities. The Qualifications section provides detailed information about our experience and expertise and information about our past performance on similar projects. Resumes are provided in Appendix A for the Project Manager and all individual specialists.

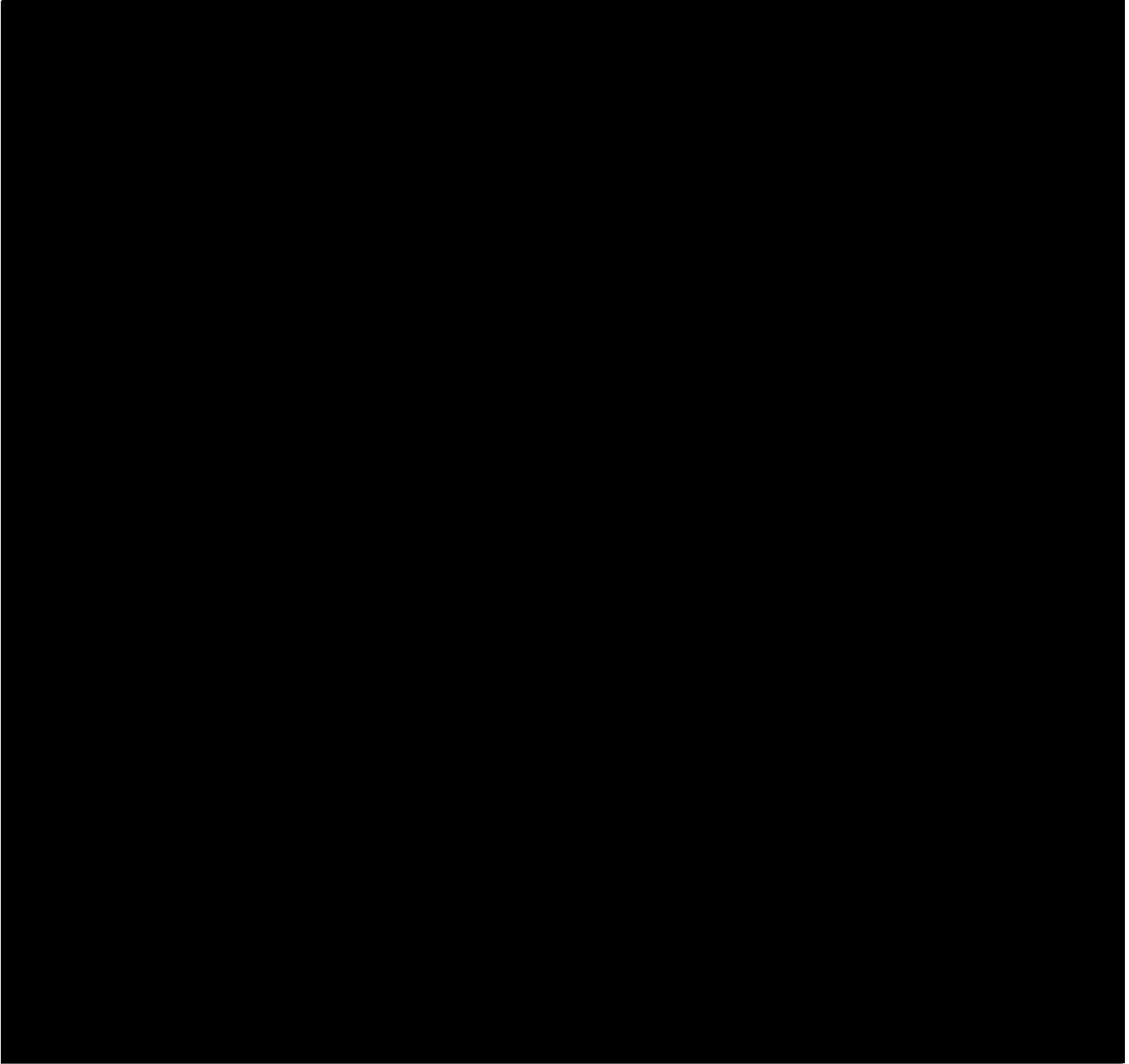
CFS proposes a strategy for NEPA analysis that maximizes the opportunity for stakeholder involvement (through public comment) to shape the project while maintaining an aggressive timeline for NEPA document preparation. All work will be completed meeting the specifications outlined in the Solicitation Appendix A. The Approach section describes the timeframes for completion of NEPA documents including scoping, review time, and the possibility for an appeal period. This will provide the basis for our Work Plan, the first deliverable proposed under this project. Our strategy subdivides the planning area into three areas, each of which will be more manageable for project planning and analysis. For each of the areas, we propose producing Environmental Assessments (EAs) for separate and distinct activities. EAs will be produced on a one-year cycle starting immediately.

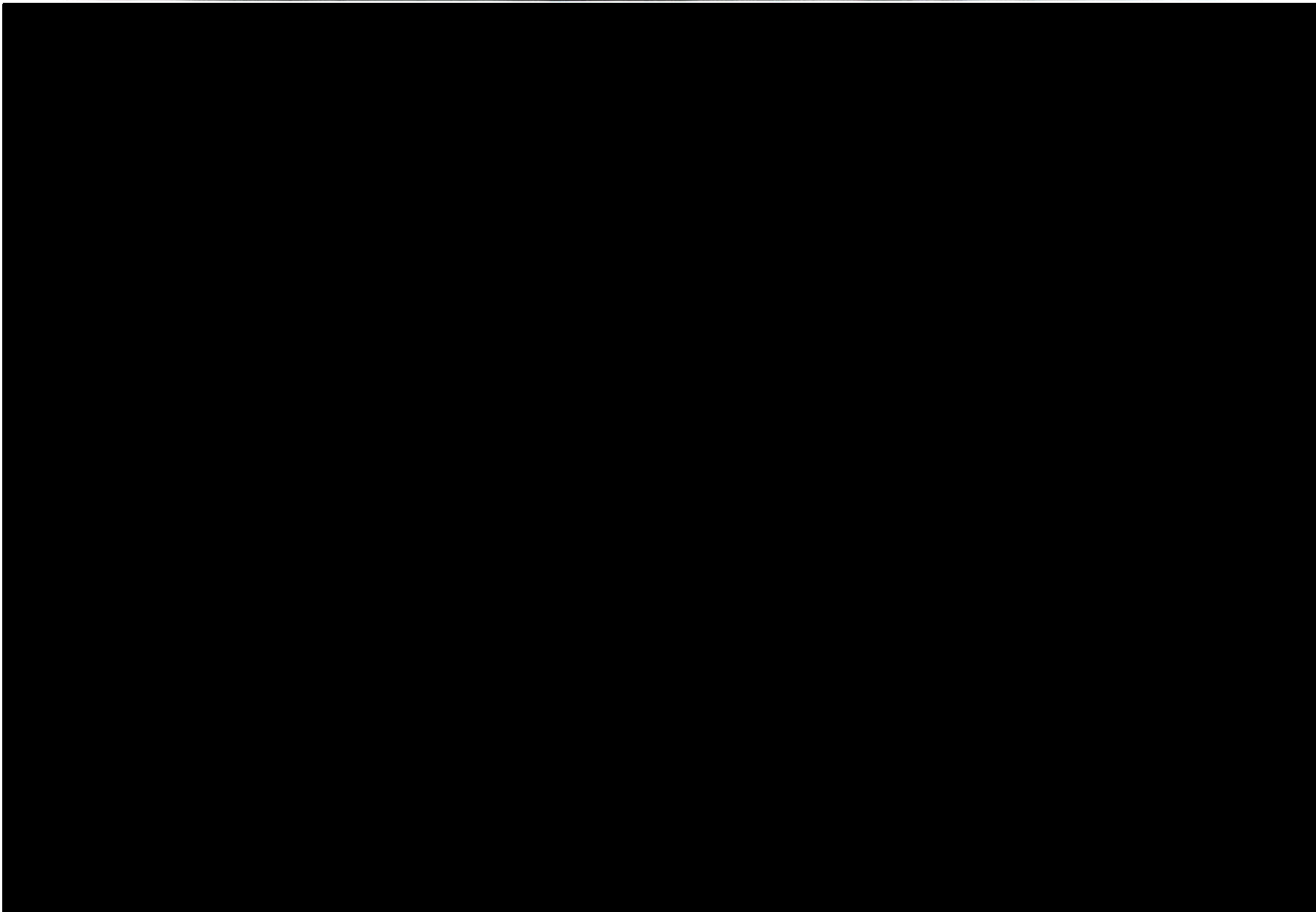
Overall, the CFS team looks forward to working with the Forest Service to complete this project. We recognize that this is a “new way of doing things” and realize that there will be “bumps along the road.” With this comes risk, on all sides. But, we are committed to making this a successful project and a template for conducting similar projects in the future.

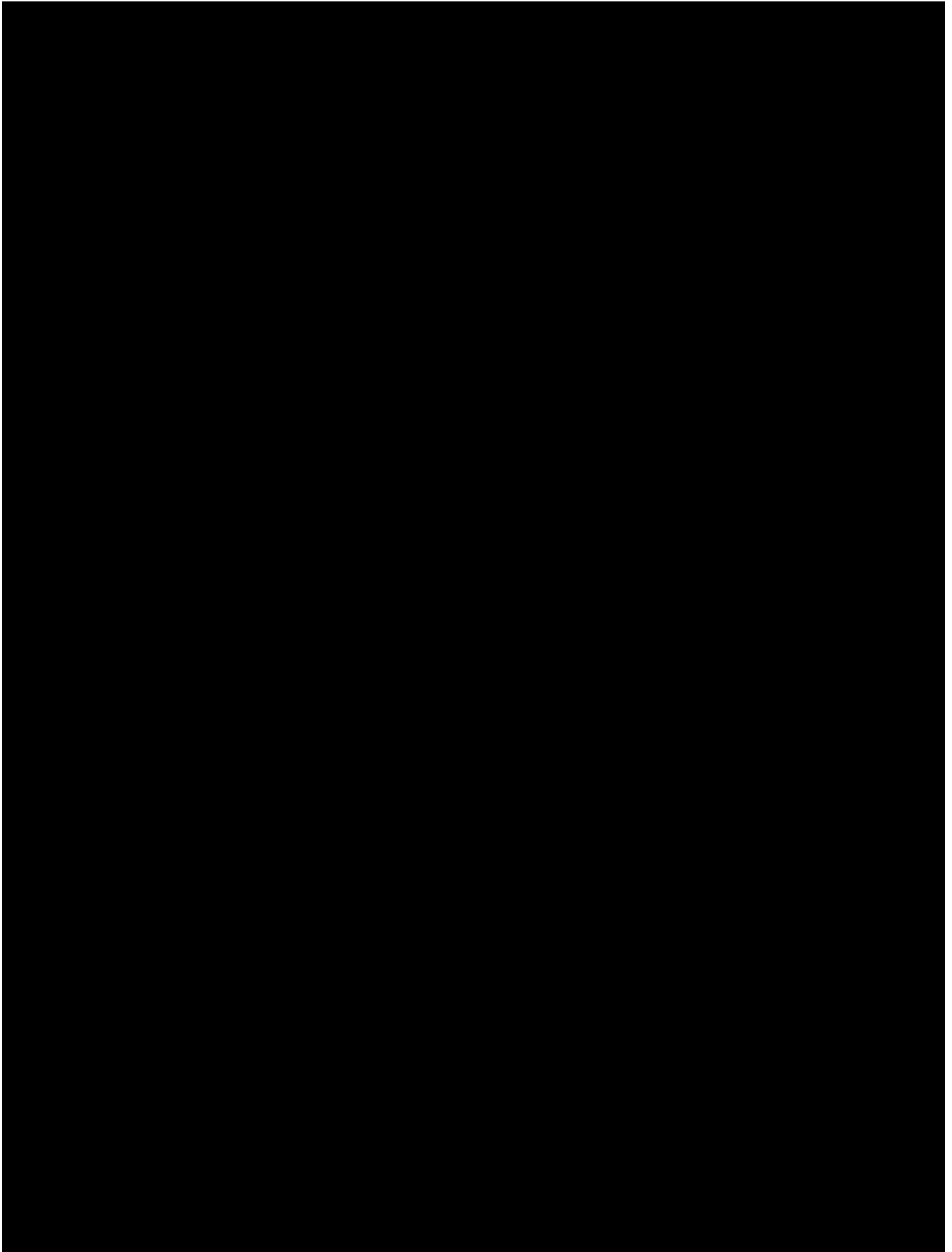
Avoiding Conflicts of Interest

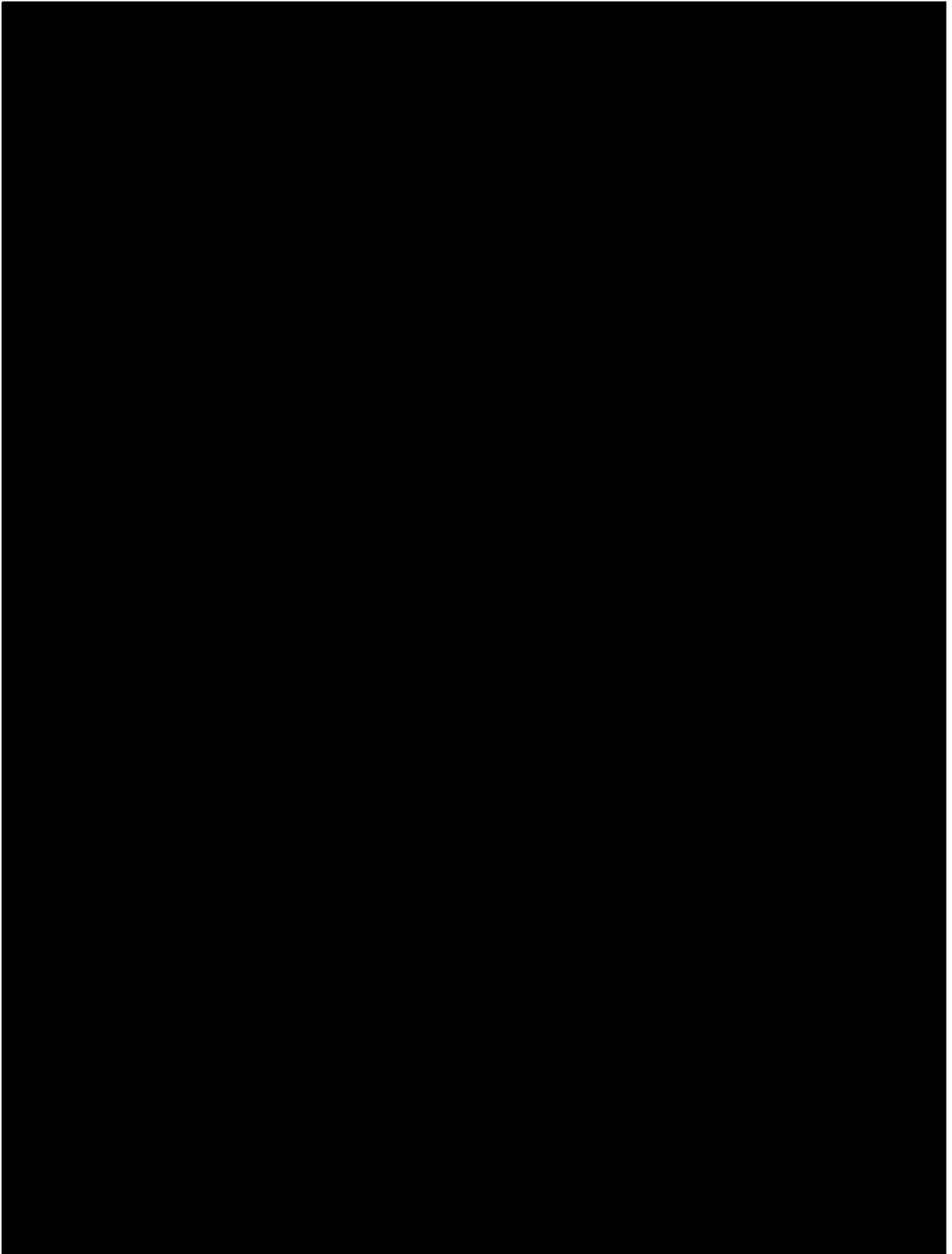
CFS recognizes that maintaining objectivity will be critical to the integrity and defensibility of our work product. We utilize several mechanisms to avoid conflicts of interest during the project. CFS will work as an independent contractor working cooperatively with and under the direction of the Forest Service. We will report directly to the Forest Service on all contract matters and will be subject to their approval for all deliverables. During the preparation of NEPA documents, our business contact with Vaagen Brothers Lumber, Inc. will be solely for submittal of invoices for services rendered. Their influence on the NEPA analysis will occur through public scoping and comment, as would be the case with any other interested

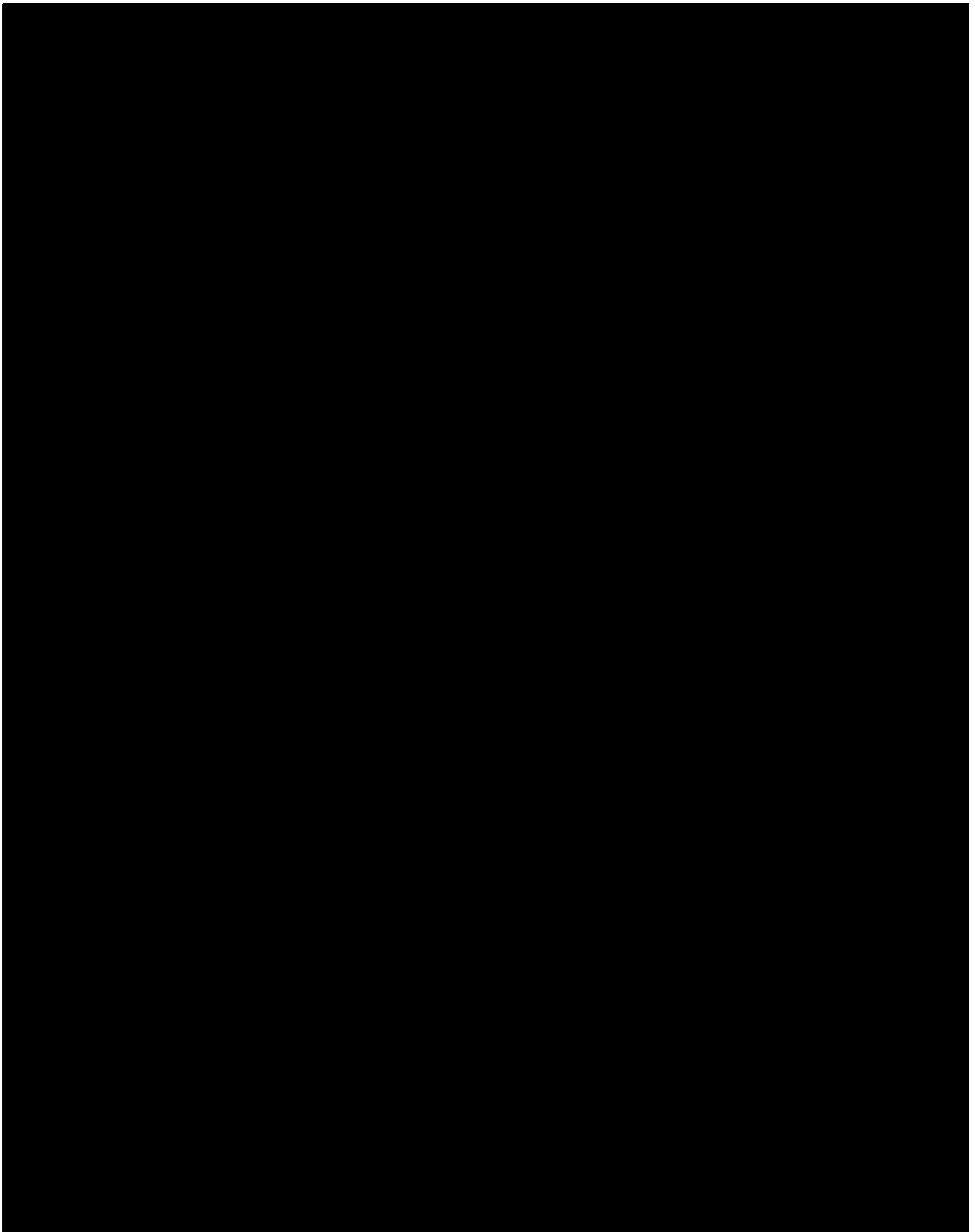
stakeholder, and through their contractor relationship with the Forest Service on this project. We will maintain an auditable project record to document this. CFS has no vested interest in the outcome of the NEPA analysis, monetary or otherwise. Our only potential for future work resulting from this project is through a job well done, and of that we recognize there is no guarantee. To our knowledge, immediate family members of the CFS team are not employed by the Forest Service or by Vaagen Brothers Lumber, Inc. If, during the execution of the project we do identify a potential conflict of interest, we will notify the Forest Service and develop a mitigation plan. Overall, our integrity is critical to our ability to continue to operate as a viable consultancy. There is no incentive for us to behave other than with the utmost objectivity.

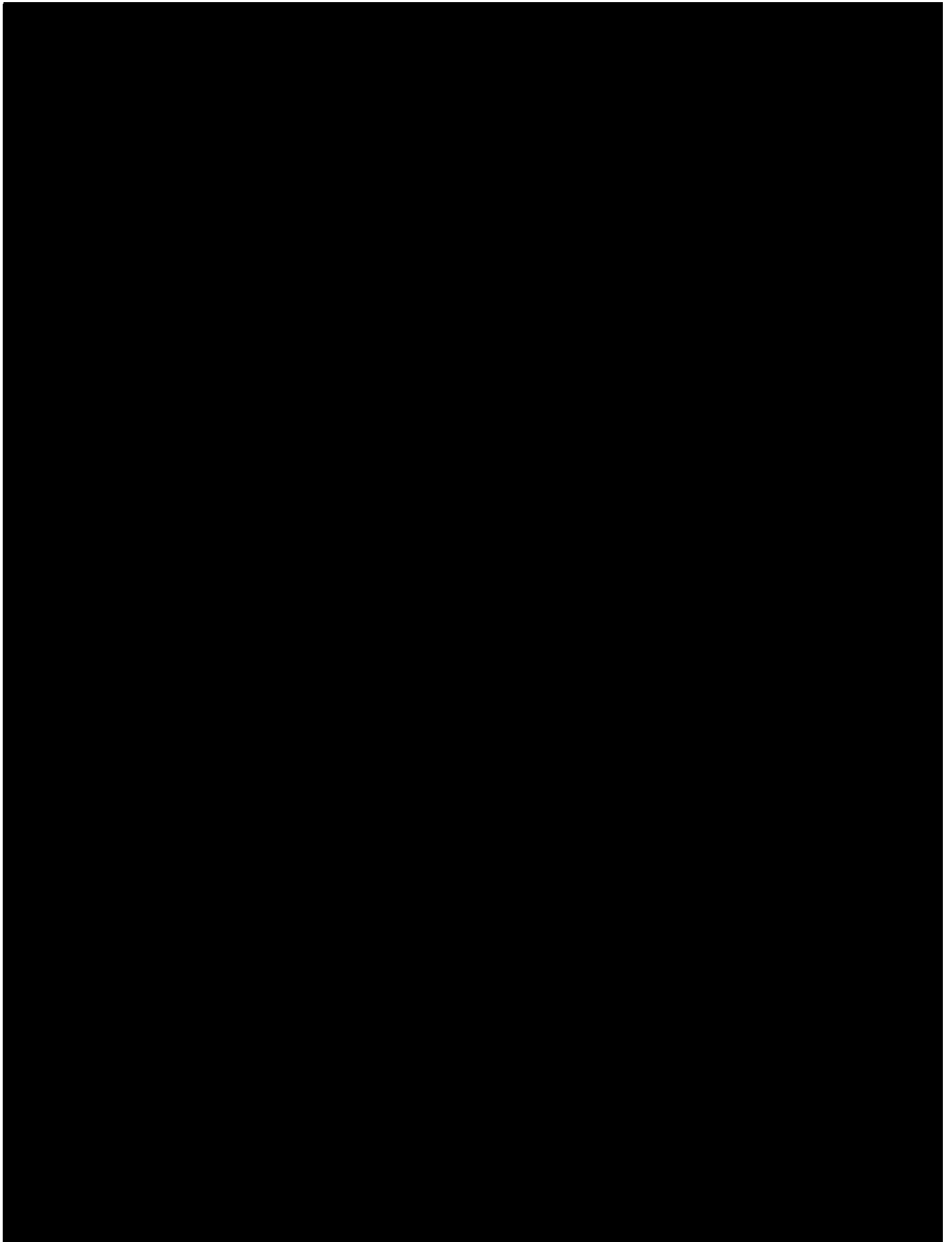


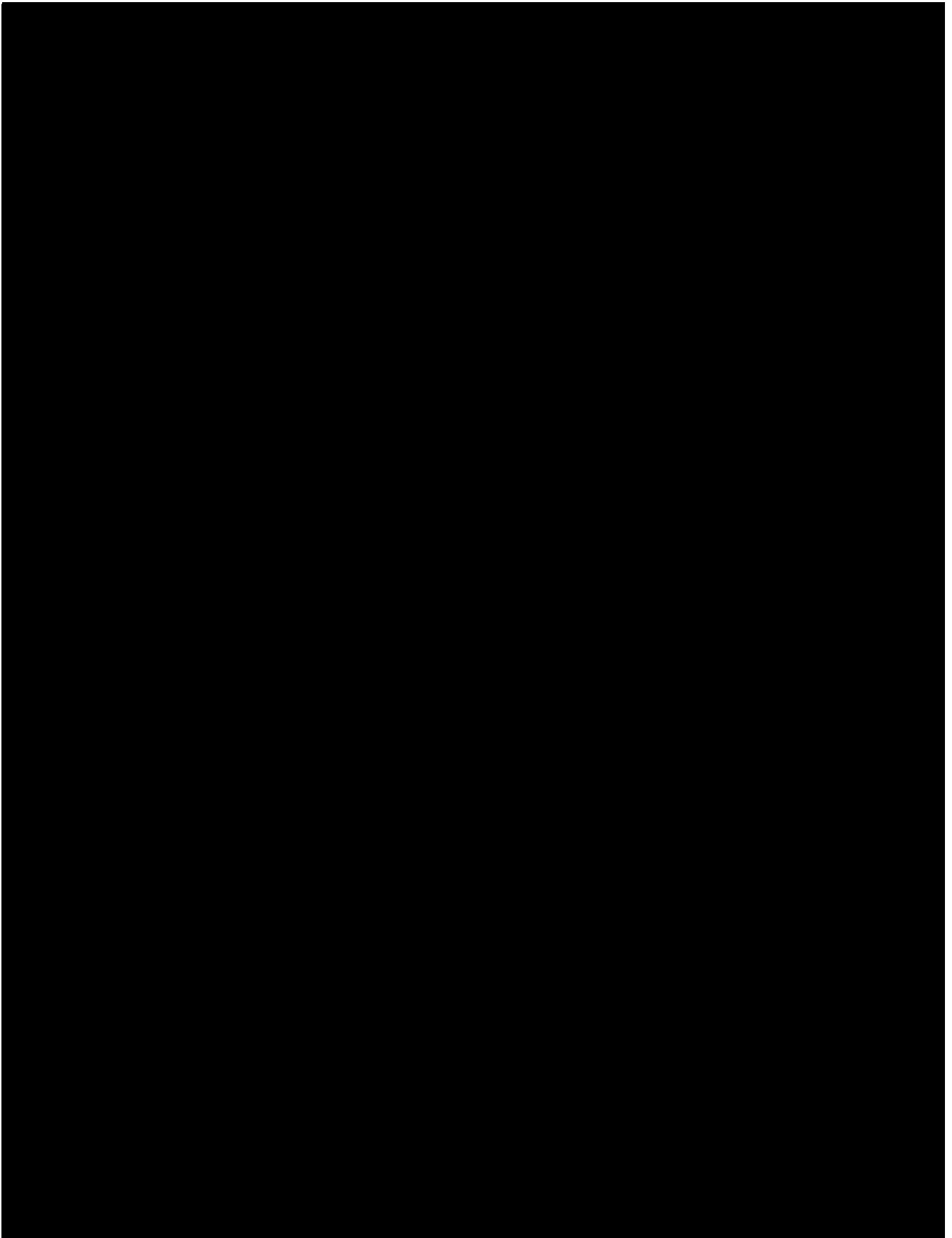


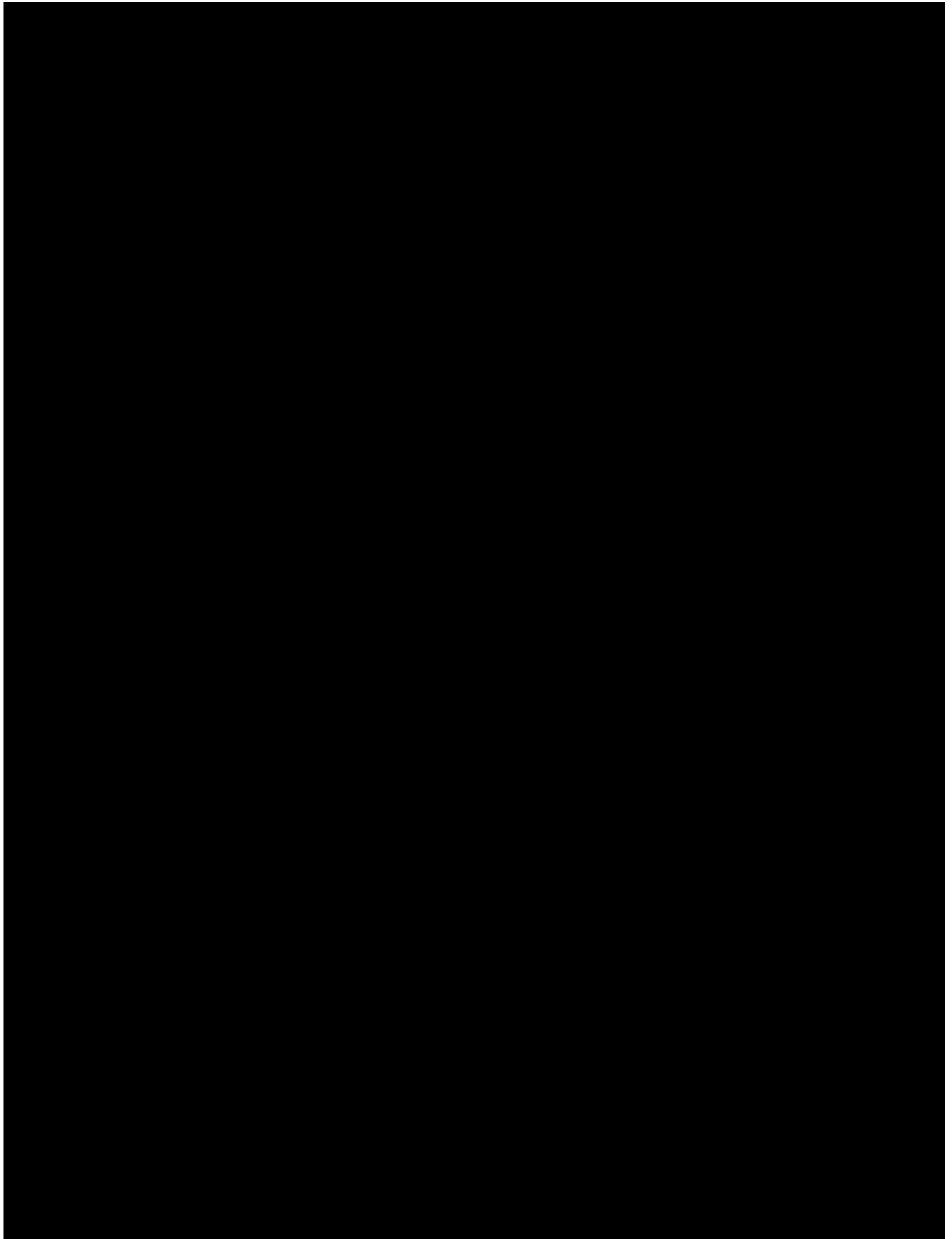


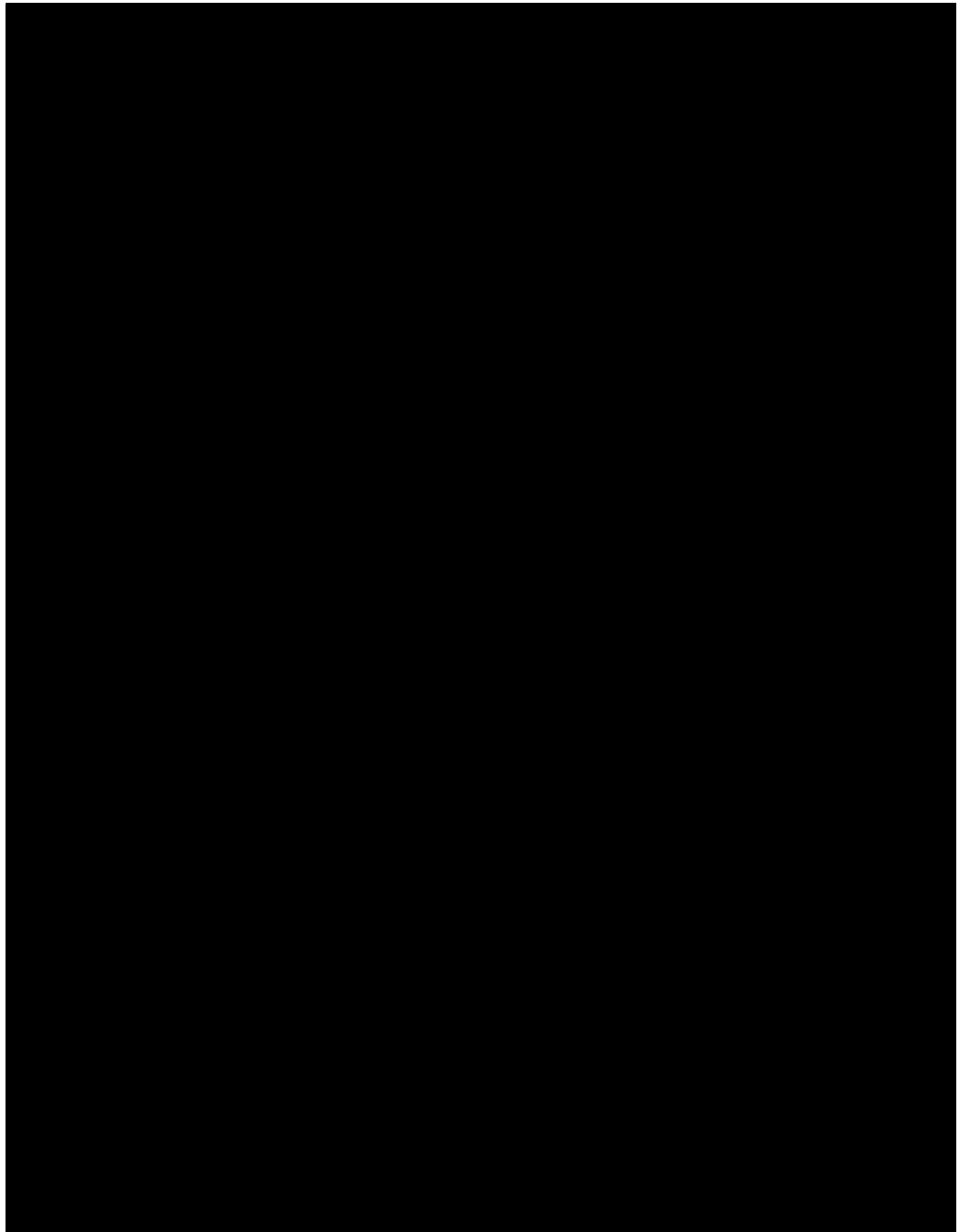


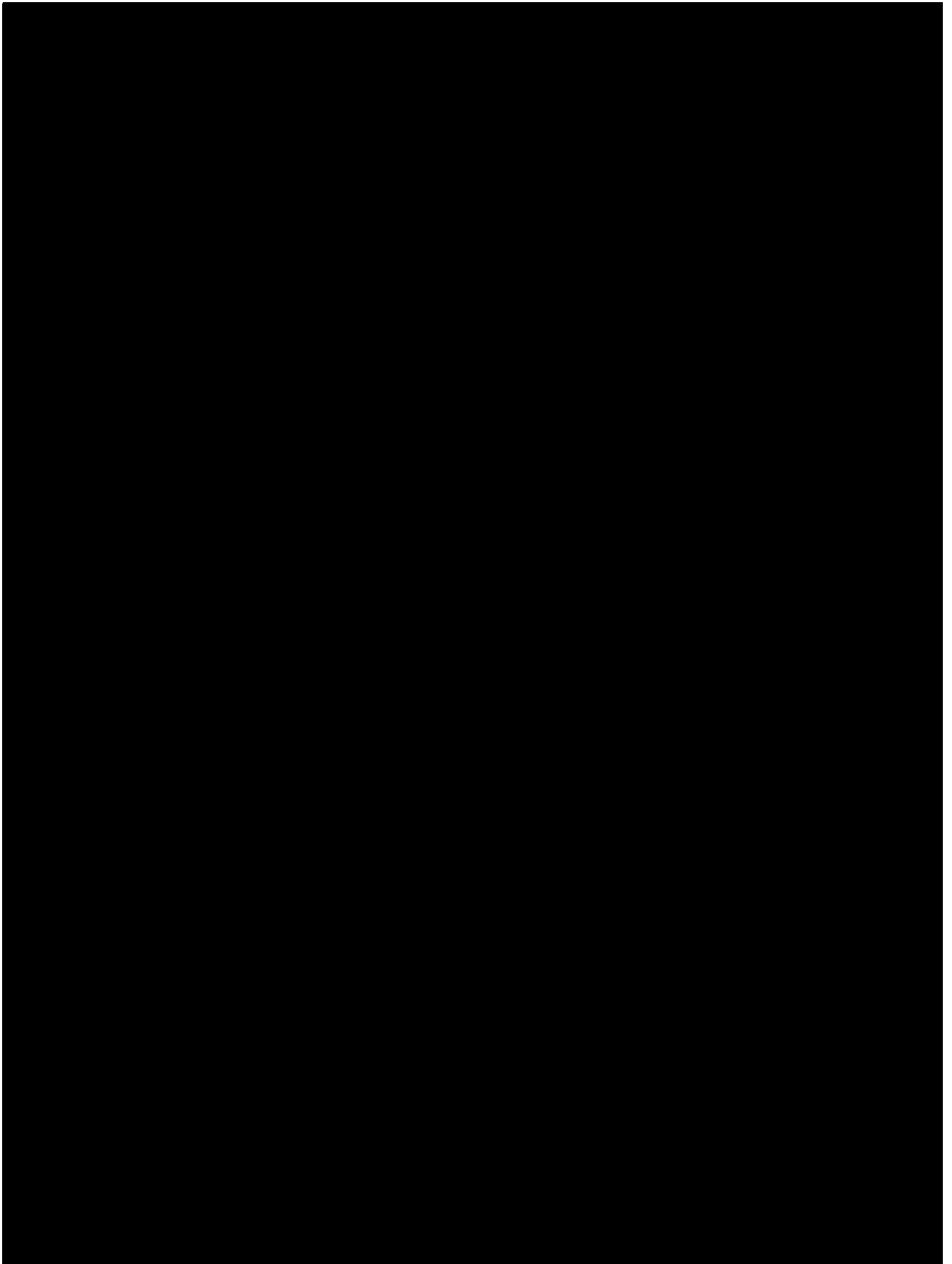


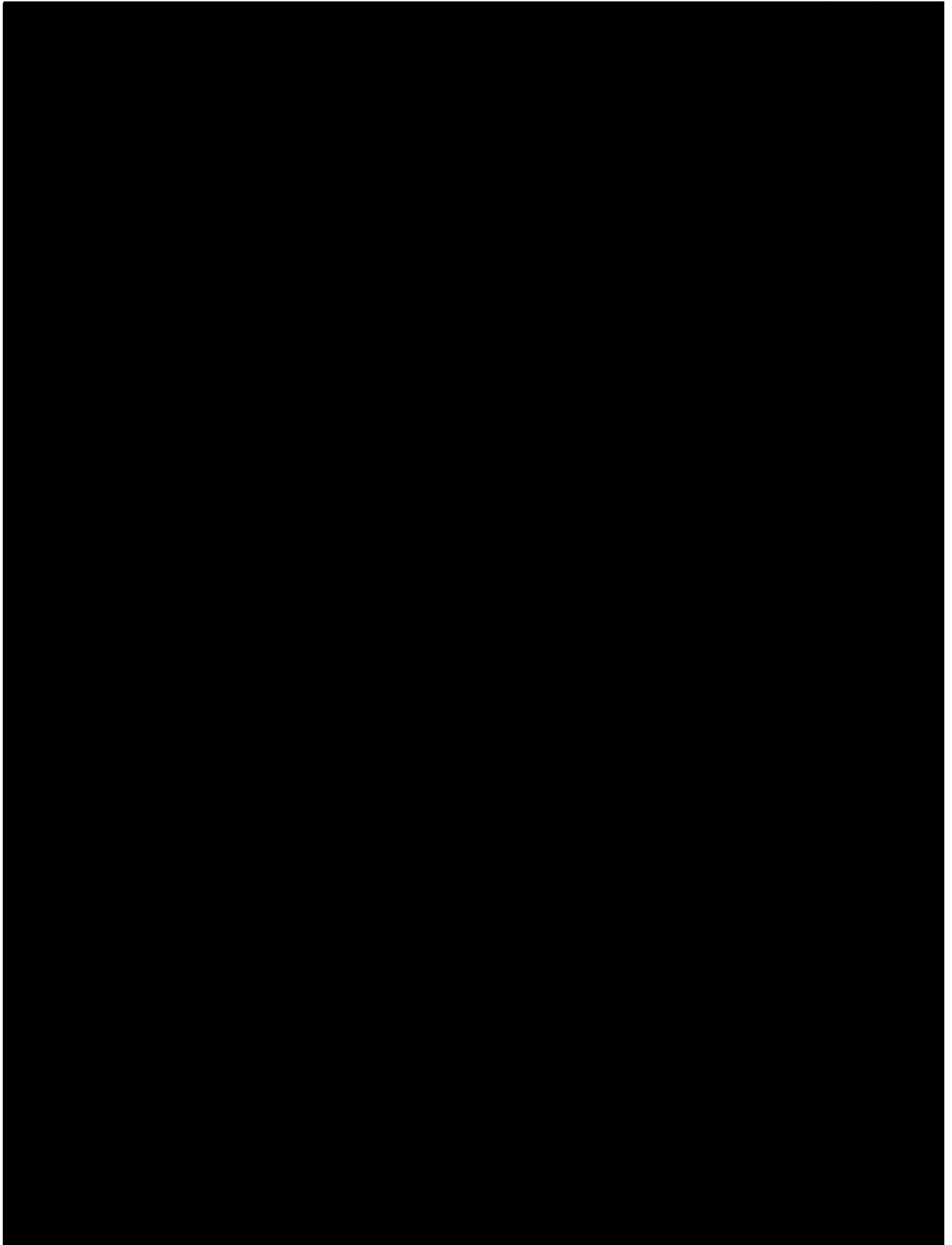


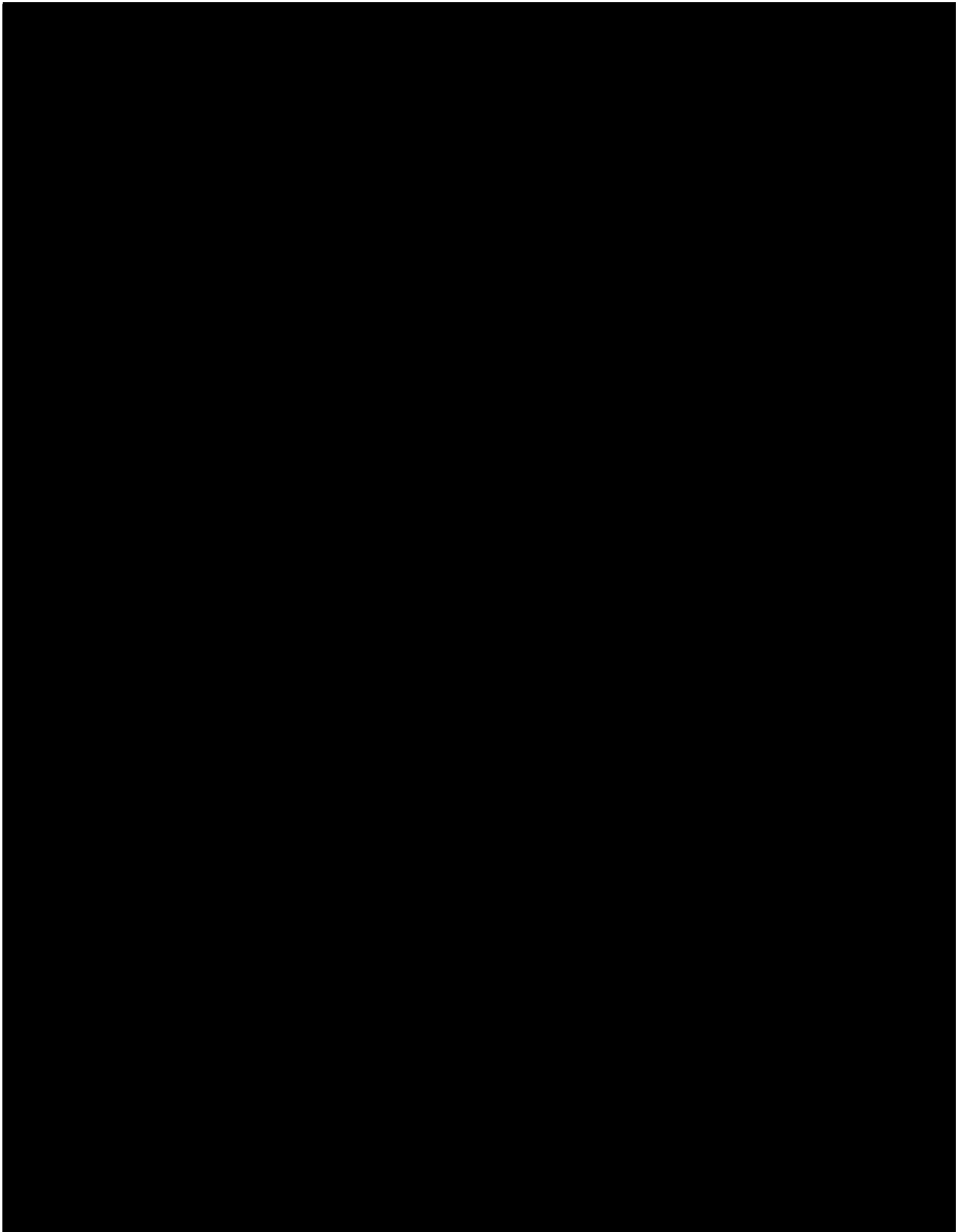


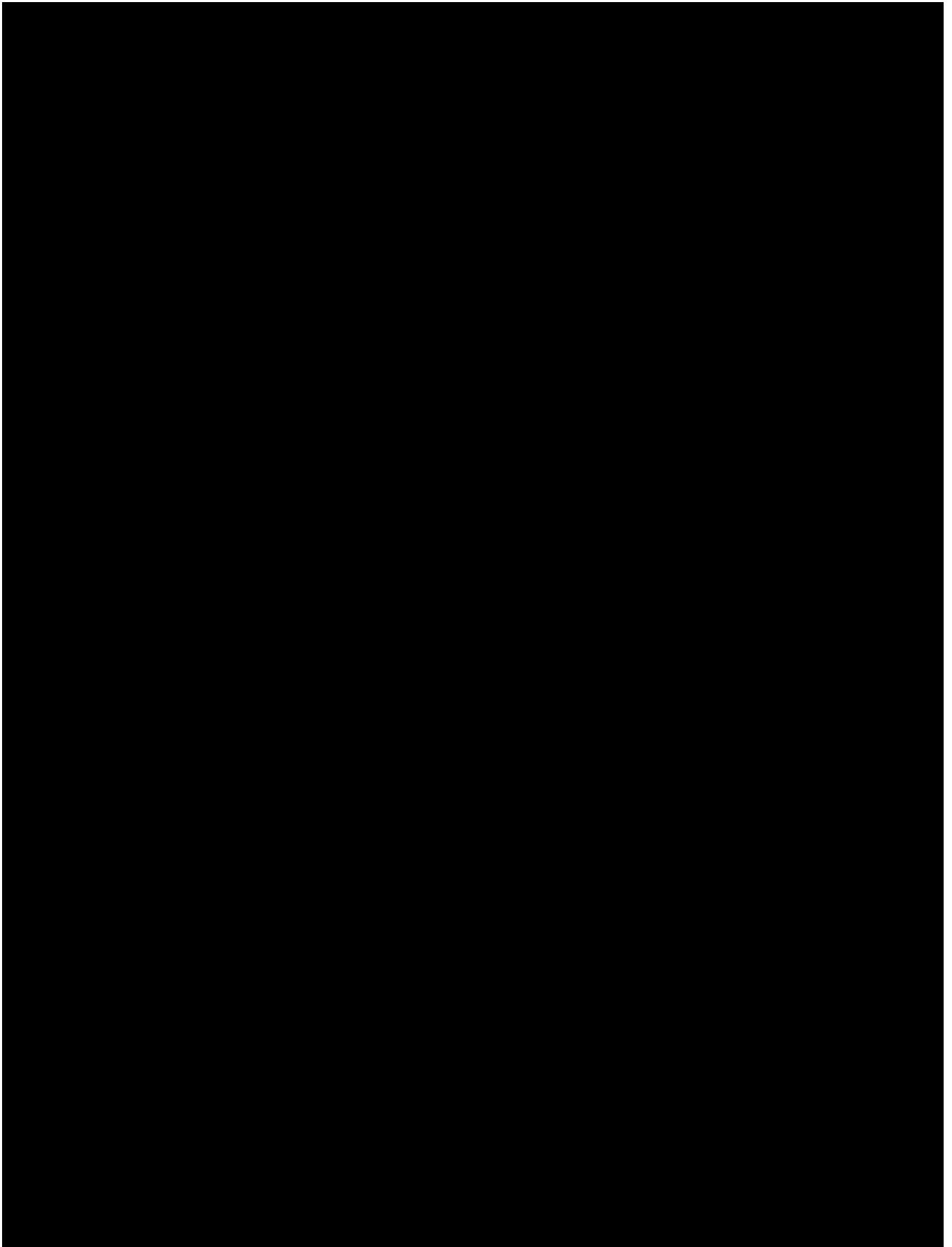


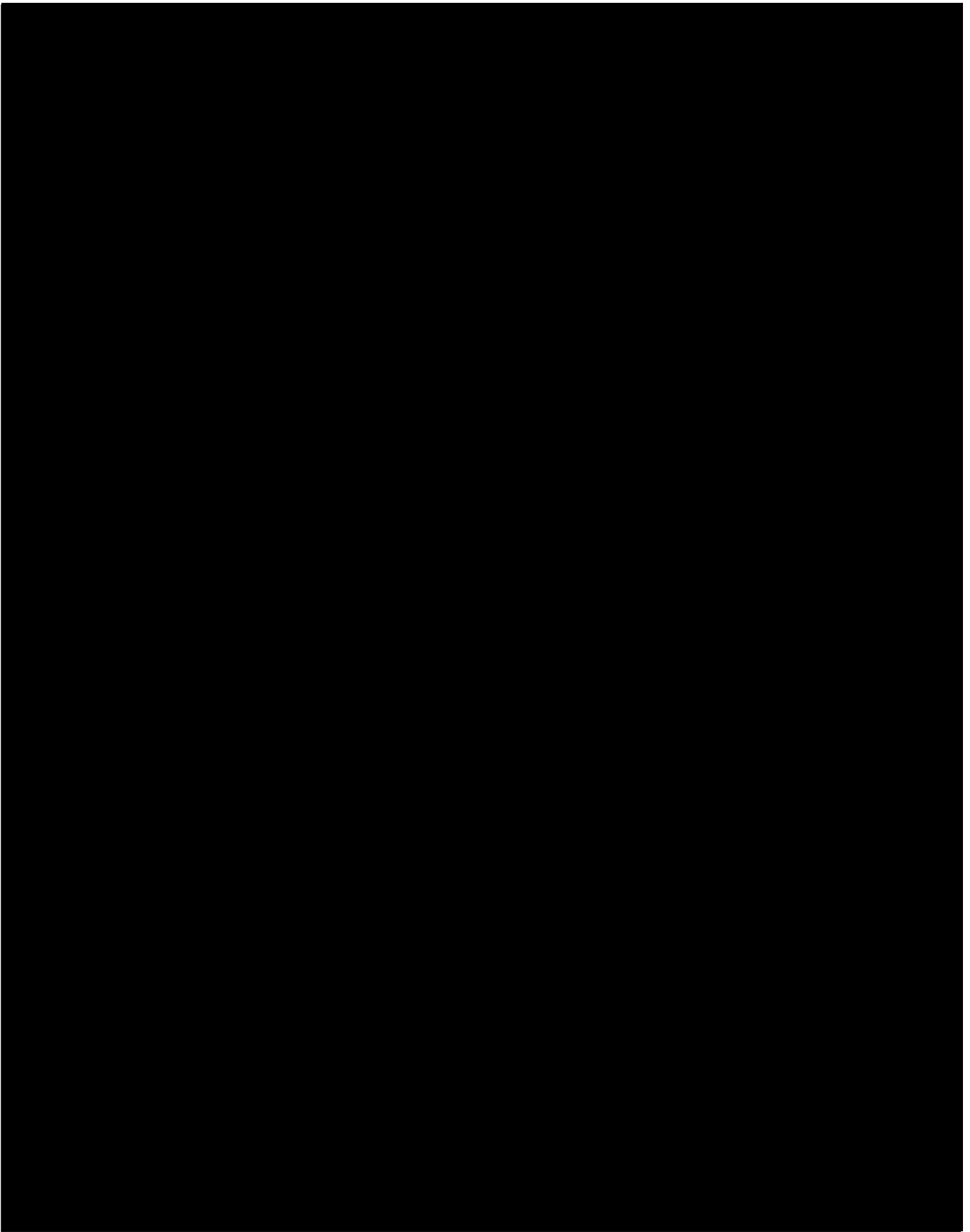


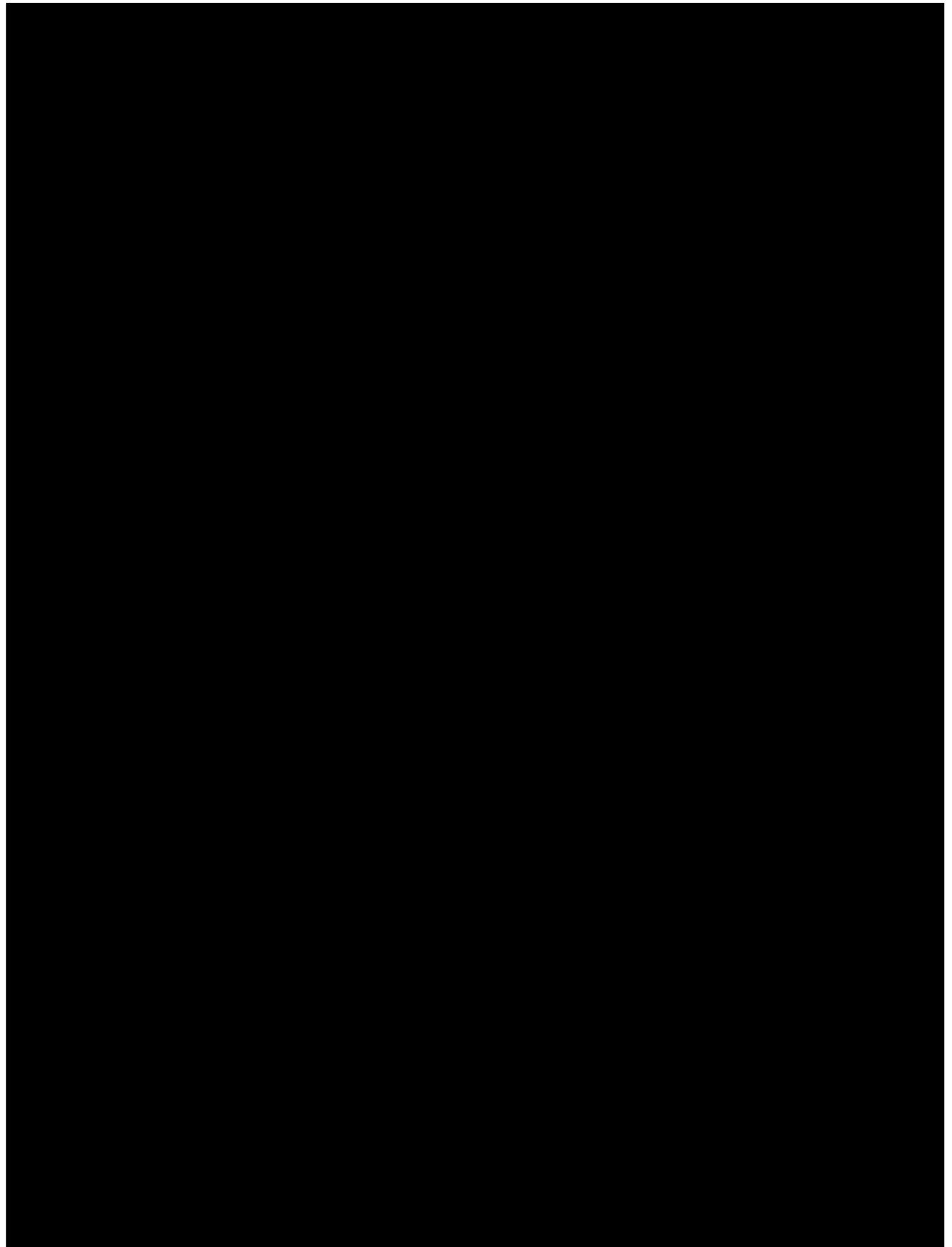


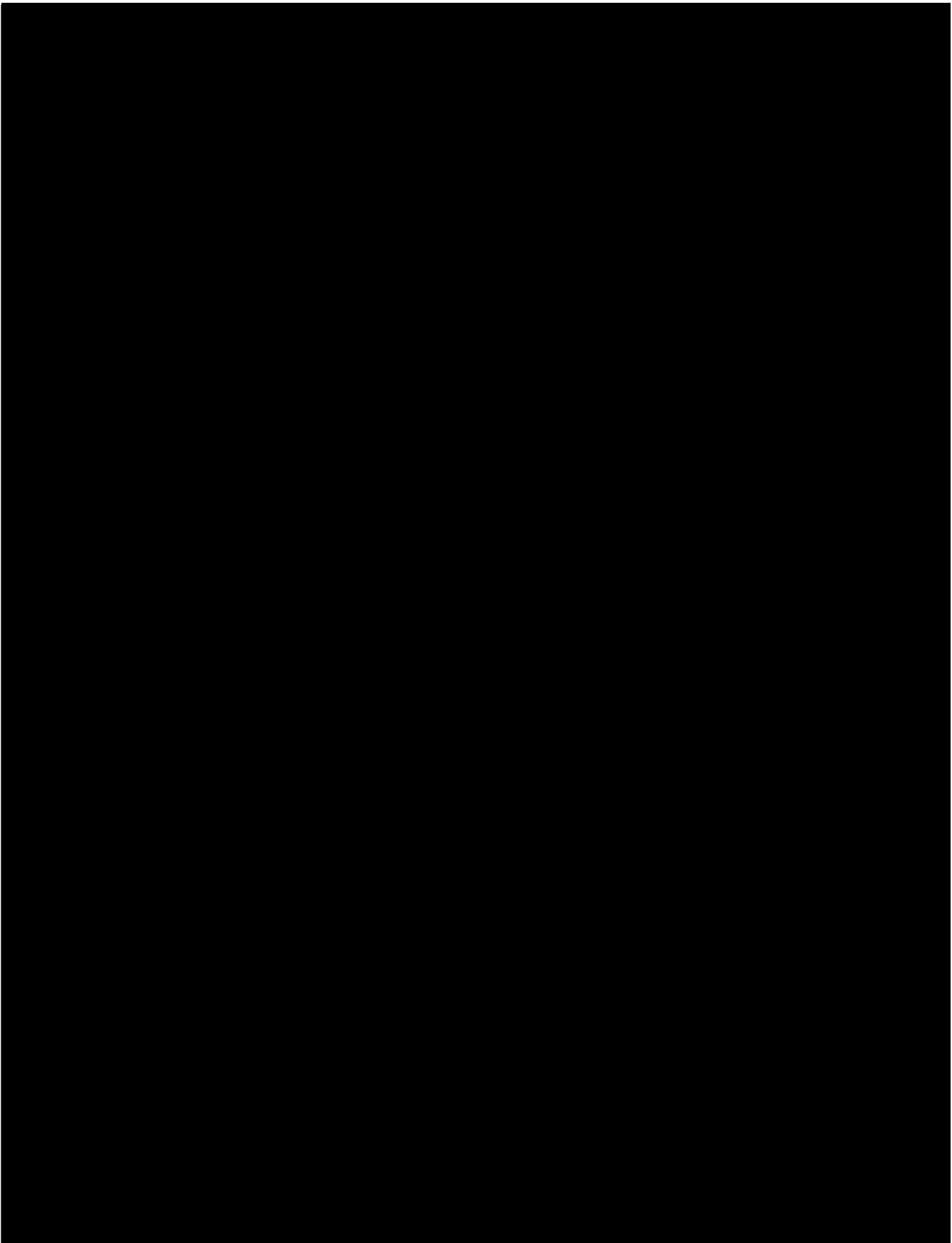


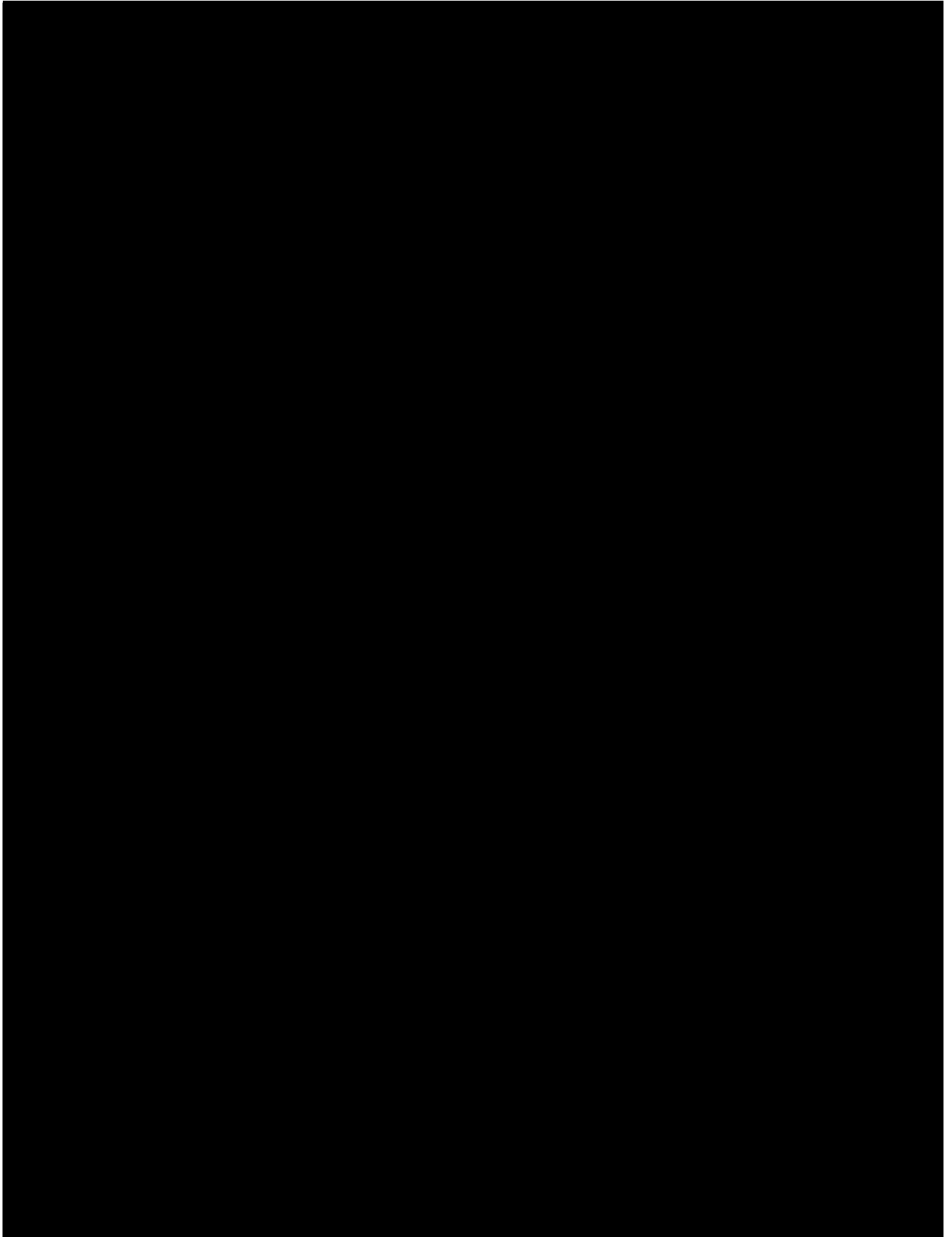


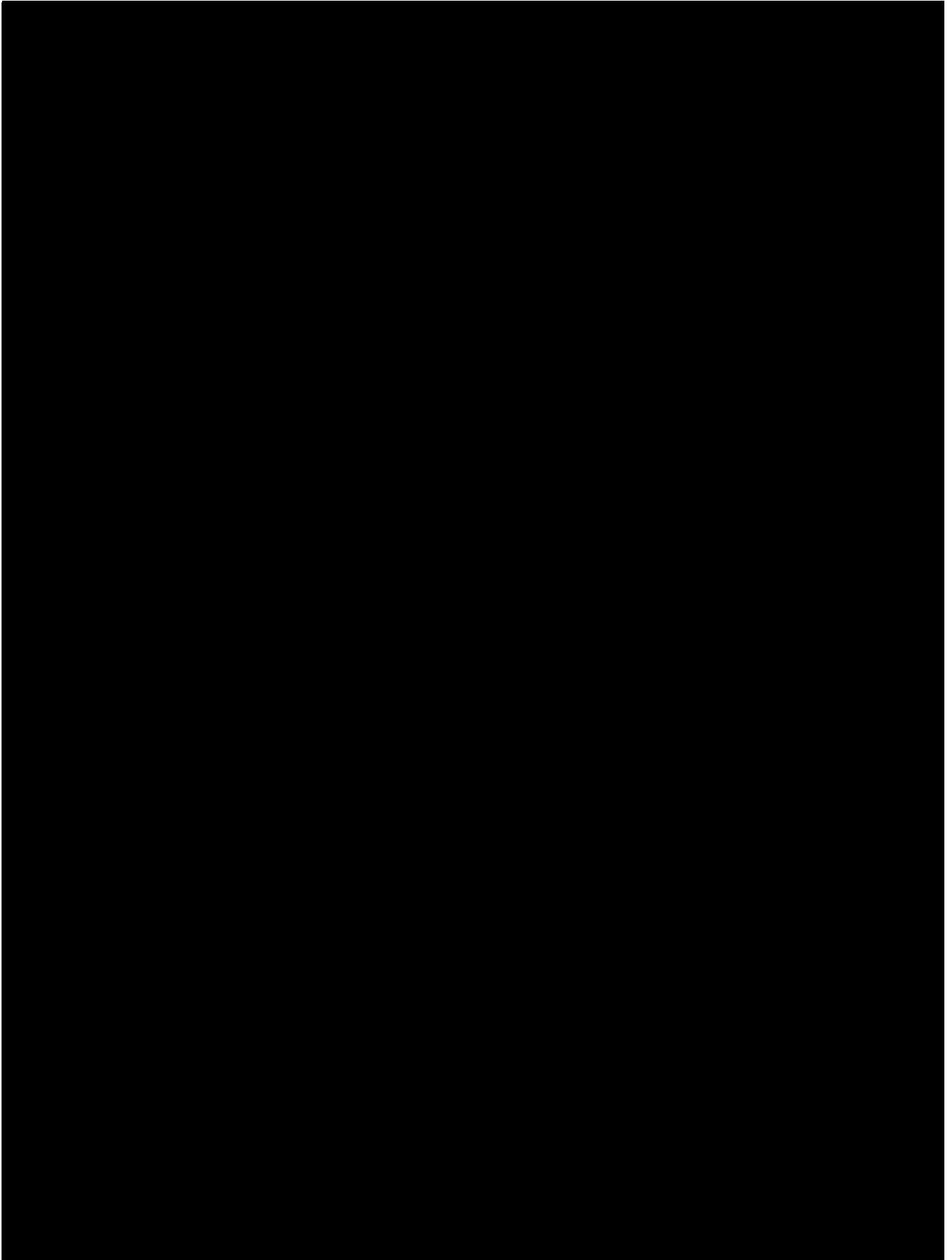


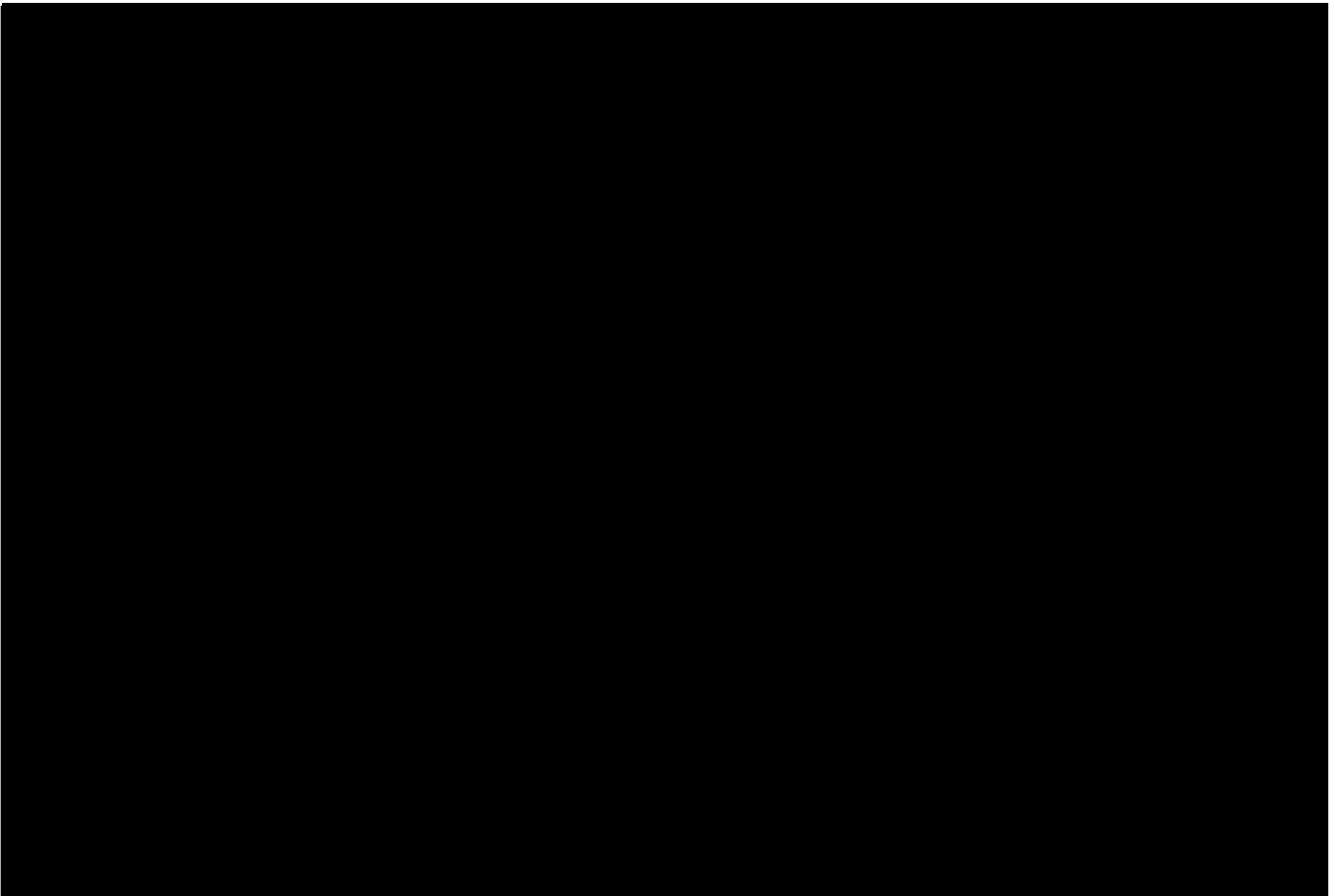












NEPA Workflow

NEPA analyses will be accomplished via parallel processes of Project Planning and NEPA Document Preparation (see Figure 4). Project Planning follows more traditional planning steps of defining project objectives, resource inventory, identification of opportunities and constraints, and alternatives development and analysis. NEPA Document Preparation involves systematic preparation of the NEPA document populated by content developed during Project Planning, as well as steps specific to the NEPA process. By conducting these tasks in parallel, we can shorten the amount of time that would be needed to complete the process, compared to that needed when designing a Proposed Action prior to public scoping. In this work flow, the Proposed Action emerges during alternative analysis. As a consequence, a large portion of NEPA process and document preparation can take place simultaneously. Besides time gains, this tactic also allows for more meaningful integration of stakeholder input into the Proposed Action—allowing us to identify a socially, economically, and environmentally acceptable means to achieve project objectives. Overall, it is our hope that in doing so the NEPA analysis for the Proposed Action can be accomplished using an Environmental Assessment (EA).

The following provides a brief synopsis of the objectives, tasks, staffing, and deliverables for each Work Plan element identified in Figure 3. These descriptions are organized into three phases—Scoping, Alternative Analysis, and Final Document—completed in sequential fashion. Scoping will culminate in the identification of a) specific opportunities and constraints to meet project objectives and b) issues to be carried forward in the NEPA analysis. Alternative Analysis will evaluate the environmental consequences of project alternatives developed to be responsive to the scoping issues and the purpose, need, and objectives of the project. This culminates with a NEPA document complete through Chapter 3. The Final Document phase will disclose this analysis to the public for comment, culminating in a Final NEPA document. If our overall work plan is adopted in late summer 2013, we anticipate completion of the Scoping phase for the North Fork Planning Area in Fall 2013, Alternatives Analysis in Winter 2013/2014, and the Final NEPA Document in Spring 2014. Time for an appeal process is not included. However, if an appeal occurs, it would extend the schedule an unspecified amount of time.

Scoping

Pre-scoping—The objective of this task is for CFS Team leaders to meet with their CNF IDT counterparts to review the Planning Area, purpose and need for the project, potential issues that may influence planning, and available information to address these issues in the NEPA analysis. We propose accomplishing this via a two-day meeting plus a one-day site visit on the CNF attended by the CFS Project Manager, NEPA Specialist, Resource Area Leads (Forestry, Biological Sciences, Physical Sciences, and Social Sciences), and Writer/Editor. For the North Fork Planning Area, this meeting will also serve as the basis for our Work Plan and a Public Participation Plan for the entire project which will be produced as a deliverable.

Define Project Objectives—Simultaneous with Pre-scoping, the CFS team and their CNF IDT counterparts will be tasked with defining specific project objectives. The intent is to translate the general project objectives articulated in the solicitation package into specific objectives addressing, among other things, CNF Forest Plan management objectives for management areas within each planning area and current knowledge of resource issues and social and economic conditions affecting management in the area. This is a critical step and will guide the entire Project Planning and NEPA Document Preparation processes.

Gather Available Data—The objective of this task is to compile all available data from the CNF and other entities which may be useful for identifying opportunities and constraints, developing and analyzing project alternatives, including the Proposed Action, and for completing the NEPA analysis. Limits for the scope of this activity will be set during Pre-scoping such that only relevant data are compiled. This task will be completed by Resource Area Leads and Specialists

in close coordination with their CNF IDT counterparts. Data will be integrated into a comprehensive GIS database by the CFS GIS/DB Manager.

Chapter 1, Purpose and Need—In close coordination with their CNF IDT counterparts, the CFS NEPA Specialist will draft content for Chapter 1 covering the Introduction, Proposal and Background (general), Purpose and Need, Regulatory Requirements, and Project Area Management Direction sections. It will be important to clearly identify project objectives. Information compiled during this internal scoping phase will be formalized within the chapter format and will serve as information to be distributed and reviewed during Public Scoping.

Public Scoping— In close coordination with their CNF IDT counterparts, the CFS Project Manager and NEPA Specialist will prepare for and solicit public input. Public input will be solicited pursuant to Forest Service guidelines and is anticipated to include advertisements for written input as well as facilitation of public meetings in Colville, Washington. During this process, the CFS Project Manager will also meet with representatives of the Northeast Washington Forest Coalition, adjacent landowners and landowners of inholdings, and other stakeholder groups identified during Pre-scoping. The CFS Writer/Editor will be responsible for compiling all comments into a public comments database to facilitate review.

The CFS Project Manager will also initiate consultation with the U.S. Fish and Wildlife Service and the Washington State Historical Society Preservation Office and prepare information for the Forest Service to initiate government-to-government consultation with regional tribes.

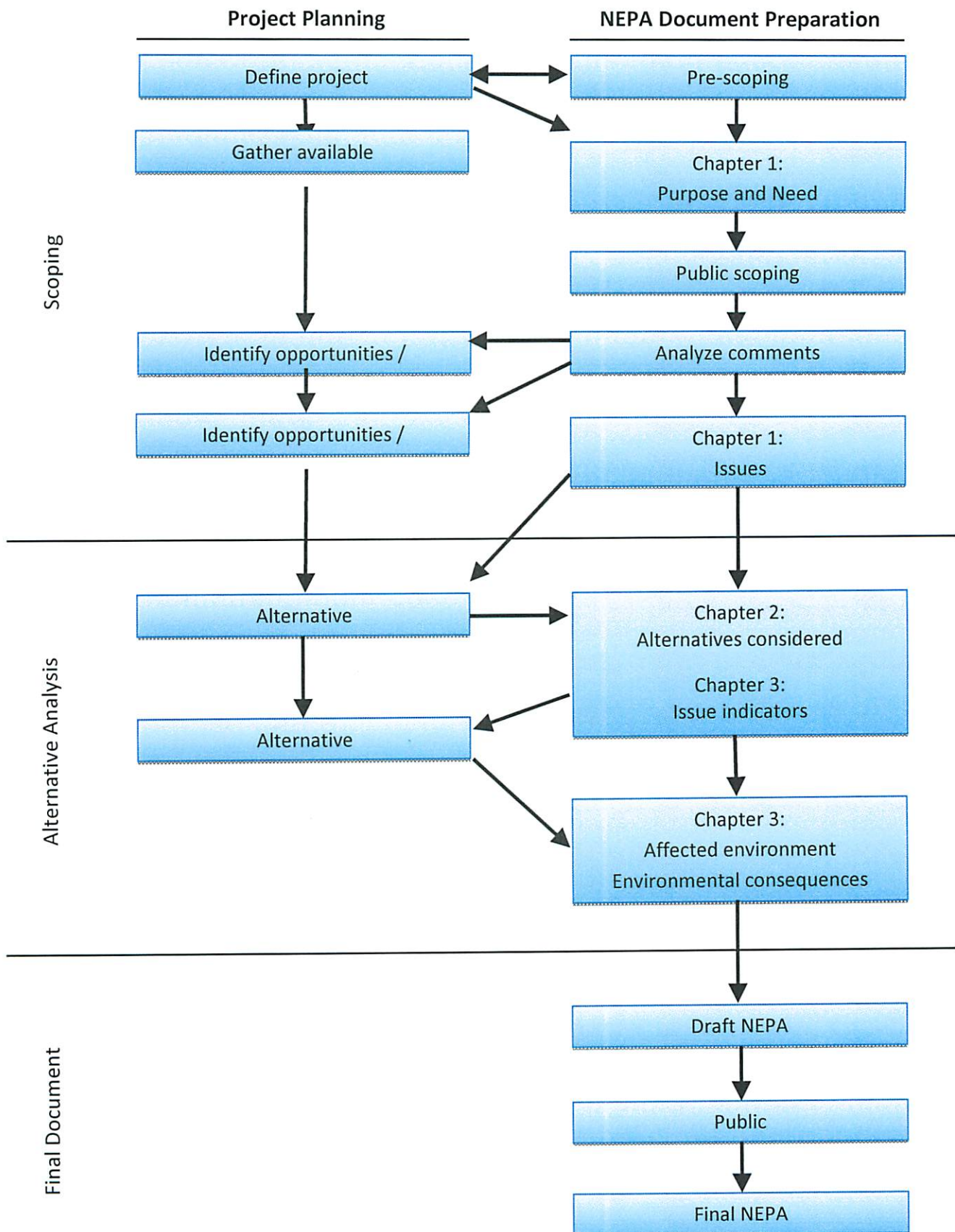


Figure 4: Proposed process for Project Planning and NEPA Document preparation.

Analyze Comments—After Public Scoping, the NEPA Specialist—in close coordination with CNF IDT counterparts—will analyze and synthesize input gathered, with the primary objective of identifying issues to be carried forward in the NEPA analysis. Resource Area Leads and Specialists will likely be asked to review topic-area comments to aid in this synthesis, in close coordination with their CNF IDT counterparts. Input will be organized into a public comments database by the CFS Writer/Editor and a synthesis of public comments will be prepared by the CFS NEPA Specialist in close coordination with their CNF IDT counterparts to support subsequent steps in the NEPA analysis.

Chapter 1, Issues—In close coordination with their CNF IDT counterparts, the CFS NEPA Specialist will draft content for Chapter 1 covering the Issues section. We anticipate Public Scoping will lead to identifying objectives for the project and issues to be considered in evaluating the project—these will all be captured under the umbrella topic of Issues in Chapter 1. This will serve as the basis for Alternatives Development in Project Planning and for Alternatives Considered and Issue Indicators in NEPA Document Preparation. Resource Area Leads and Specialists along with their CNF IDT counterparts will review topic-area issues in development of this Chapter 1 content.

Identify Opportunities and Constraints—At this point, all available data will be reviewed within the context of public comments to identify opportunities and constraints to meet project objectives within the Planning Area. CFS will accomplish this in close collaboration with the CNF IDT in a workshop or webinar setting. CFS Resource Leads and Specialists may find it useful to conduct preliminary analysis in close consultation with their CNF IDT counterparts ahead of this. If possible, field trips may be arranged. During the workshop, we will capture potential opportunities and constraints from each Specialist by various means (e.g., annotated base maps, logging systems analyses, GIS queries) that will be included in the comprehensive GIS database by our GIS/DB Manager. This is an important collaborative step and will identify preliminary project alternatives to be reviewed in the field and through NEPA analysis.

Field Data Collection—Significant data gaps and additional data needs will be identified through Pre-scoping and Public Scoping. Through Identification of Opportunities and Constraints, specific areas can be identified where additional data collection may be focused. This may involve actual layout of preliminary project locations (e.g., road locations, harvest unit boundaries, etc...). Such layout will also be useful to support meaningful development and analysis of alternatives. Field data collection will be coordinated by Resource Area Leads and Specialists, in collaboration with their CNF IDT counterparts, and conducted by Resource Specialists and technical staff, as appropriate. Data will be integrated into a comprehensive GIS database managed by the CFS GIS/DB Manager for all team members to access.

Alternative Analysis

Alternative Development—The objective of this task is to develop a range of reasonable alternatives in response to the issues identified in the Scoping phase and designed to give the decision-maker a clear basis of choice among options. This task will be led by the CFS Project Manager with participation of the NEPA Specialist, Resource Area Leads and Specialists, and their CNF IDT counterparts. We propose accomplishing this task by developing a set of preliminary alternatives that can form the basis for effective discussion by the group. This preliminary set of alternatives will be informed by the Identification of Opportunities and Constraints, framed by Chapter 1, Issues, and potentially refined by Field Data Collection. We propose this discussion take place via a one-day webinar hosted by CFS. Input gathered through this webinar will form the basis for the development of a final set of Alternatives Considered, including the identification of a Proposed Action and the No Action alternative. Locations of project alternatives will be captured by the CFS GIS/DB Manager for use by the entire team. If there is any need to refine proposed project locations in the field, it will be accomplished at this time.

Chapter 2, Alternatives Considered and Chapter 3, Issue Indicators—Based on the outcome of the Alternatives Development task, the CFS NEPA specialist will draft, in close coordination with their CNF IDT counterparts a) content for Chapter 2 covering the Introduction, Alternatives Considered but Eliminated from Detailed Analysis, Alternatives Considered in Detail, and Elements Common to All Action Alternatives sections and b) content for Chapter 3 covering the Resource Affected and Significant Issue Indicators sections. Resource Area Leads and Specialists will be asked to develop Significant Issue Indicators in close coordination with their CNF IDT counterparts.

Alternative Analysis—A large portion of the overall effort expended by Resource Leads and Specialists will occur in this task. The objective will be to conduct analyses necessary for the preparation of Specialist Reports containing all information required for full disclosure of effects related to identified issues. Analyses will be conducted in close consultation with CNF IDT counterparts, will be fully responsive to the issues identified in the Scoping phase, and will be synthesized via Significant Issue Indicators used by the decision-maker for choosing among options. Several suggested analyses have been identified by the Forest Service, though the exact nature and extent of these analyses will be clarified through the NEPA process. Specialists Reports will provide detail regarding data, analytical methods, and results. However, we intend them to include content that can be directly incorporated into the Draft NEPA document, including selected Appendices (e.g., BMPs, Monitoring, etc.).

Chapter 3, Affected Environment and Environmental Consequences—The NEPA Specialist, working closely with their CNF IDT counterparts, and the CFS Writer/Editor, and GIS/DB Manager will incorporate relevant content directly from the Specialist Reports into Chapter 3—covering the Introduction, Forest Plan Direction, Scope of Analysis, Affected Environment, Environmental Effects, Forest Plan Consistency, and Irreversible and Irretrievable Commitment of Resources sections. To the extent possible, Resource Leads and Specialists will follow a consistent style guide when drafting their Specialist Reports. However, we anticipate that substantial editing will be needed to bring content into a consistent, readable form. By this point, the NEPA document will be complete through Chapter 3.

Final Document

Draft NEPA Document— The Project Manager and NEPA Specialist, working closely with their CNF IDT counterpart and the CFS Writer/Editor and GIS/DB Manager, will complete final content and formatting for preparation of the Draft NEPA document that will be issued for Public Comment. This will entail incorporating additional content from the Specialist Reports (e.g., Mitigation Measures, Monitoring and Evaluation, etc.), and selected Appendices. It will also entail preparation of key sections, including Proposed Action, Public Involvement, Decision to be Made, Comparison of Alternatives, and Implementation Plan. All content will be formatted according to Forest Service specifications.

Public Comment— In close coordination with their CNF IDT counterparts, the CFS Project Manager and NEPA Specialist will prepare for and solicit public comment on the Draft NEPA document. If this is an EA, this document will be released for a 30-day comment period. The CFS Writer/Editor will be responsible for compiling all comments into a public comments database to facilitate their review.

Respond to Comments— In close coordination with their CNF IDT counterparts, the CFS Project Manager and NEPA Specialist will facilitate the preparation of responses to comments received during the 30-day comment period. Resource Leads and Specialists, in close coordination with their CNF IDT counterparts, will be asked to prepare responses specific to their resource areas. These responses will form the basis for revision of the Draft NEPA document and preparation of a Final NEPA document.

Final NEPA Document—The CFS Project Manager and NEPA Specialist, in close coordination with their CNF IDT counterparts, will oversee preparation of the final NEPA document. Revisions will address substantive comments. Resource Leads and Specialists, in close coordination with their Forest Service counterparts, will be asked to revise content as needed. This final task in the workflow will produce the final document from which the Forest Service

will make their decision informed by the NEPA analysis. At this time, Resource Specialists will compile Biological Assessments/Biological Evaluations from content in the Final NEPA document and Specialists Reports to satisfy Section 7 consultation.

Project Management

Throughout the project, the CFS Project Manager will be responsible for ensuring all work products are completed to the necessary specifications and on schedule. The CFS Project Manager's tenure working with the Resource Area Leads (since the mid-1990s) and his Executive position within CFS will aid in accomplishing these goals. He will have influence and resources to accomplish this project. The CFS Project Manager will work with the Forest Service COR to ensure potential roadblocks for meeting deadlines are addressed. He will coordinate at least bi-monthly with the Forest Service COR. He will also work with the Forest Service COR to arrange information requests and coordination with the Forest Service IDT members. To maintain our aggressive project schedule, we hope to negotiate a streamlined mechanism for accomplishing this. At many points we describe how we will achieve tasks "in close coordination with our CNF IDT counterparts". We are sincere about this and view it as critical to developing a defensible document; but, the process needs to be more efficient than outlined in the solicitation. We propose developing an effective team communication plan as part of our Work Plan.

Given the amount of information that will be compiled during this project, information management will be critical. The CFS Project Manager will rely heavily on the Writer/Editor and GIS/DB Manager who will report directly to him. The Writer/Editor will maintain the project public contact list, meeting notes, the database of public input from Public Scoping and Public Comment, and our repository of references. The Writer/ Editor will also oversee consistent style and content preparation of Specialist Reports and he will compile all content from the entire project team into the draft and final NEPA document. He will ultimately be responsible for compilation of the Project Record according the Forest Service standards. The GIS/DB Manager will be responsible for maintaining a GIS database of all project information used in NEPA analysis in a format that it easily submitted to the Forest Service at the end of the contract.

Finally, we understand that it will be necessary for the CFS Project Manager to coordinate with the Responsible Official or their Delegated Official at selected points in the NEPA process for seeking signed approval of key project elements identified in the solicitation. These include requesting approval for:

- Public participation plan

- Public Scoping materials
- Key issues and alternatives
- Draft NEPA document prior to printing for distribution
- CFS response to public comments
- Final BAs/BEs (if required)
- Final Road Analysis Report
- Final NEPA document prior to printing for distribution
- Project Record

Resumes

Resumes are attached following this page.